

## 6.0 SYSTEM PERFORMANCE

### MTCA Method A Cleanup Levels for Soil and Groundwater

CONSTITUENT	SOIL CLEANUP LEVELS	GROUNDWATER CLEANUP LEVELS
BENZENE	0.03 mg/kg	5 µg/l
TOLUENE	7 mg/kg	1,000 µg/l
ETHYLBENZENE	6 mg/kg	700 µg/l
XYLENES	9 mg/kg	1,000 µg/l
MTBE	0.10 mg/kg	20 µg/l
TPH (Gasoline)	30 mg/kg	800 µg/l
TPH (Diesel)	2,000 mg/kg	500 µg/l

TPH (G) = Total Petroleum Hydrocarbons (Gasoline range)

TPH (D) = Total Petroleum Hydrocarbons (Diesel range)

mg/kg = ppm

µg/l = ppb

### 6.1 POINTS OF COMPLIANCE

The point of compliance for meeting soil cleanup levels at the Priceless Gas Site was selected on the basis of the provisions of WAC 173-340-740(6). The point of compliance for soils is the entire site. Soil cleanup levels have been established for the site using MTCA Method A, as provided for in WAC 173-340-740(2). This method was determined to be consistent with WAC 173-340-704(1) which provides that MTCA Method A cleanup levels are appropriate for those sites with few hazardous substances, undergoing a routine cleanup action as defined in WAC 173-340-200.

The points of compliance for meeting groundwater cleanup levels at the Priceless Gas Site were selected on the basis of the criteria specified in WAC 173-340-720(8). The points of compliance are monitoring wells MW-1, MW-2, MW-3, and MW-6 (refer to Figure 2 for compliance well locations). Groundwater cleanup levels have been established for the Site using MTCA Method A, as provided for in WAC 173-340-720(3). Although the groundwater in this area is an unlikely source of potable groundwater, Ecology has chosen to apply the more conservative cleanup values defined under Method A. The conservative approach was selected out of consideration of the potential threat to Cottonwood Creek and historical problems with increased exposure risk due to the high groundwater conditions.

## 6.2 SYSTEM PERFORMANCE MONITORING

Quarterly groundwater monitoring will include the sampling and analysis of previously identified points of compliance wells (MW-1, MW-2, MW-3, and MW-6) and system performance will be accomplished through the sampling of: MW-4, MW-5, MW-7, MW-8, MW-9, and MW-10 (refer to Figure 2 for system performance monitoring well locations). Groundwater monitoring will continue until compliance with the established cleanup levels is demonstrated for four (4) consecutive quarterly sampling events. Groundwater monitoring will be conducted in a manner consistent with the MTCA provisions for compliance monitoring described in WAC 173-340-720(9).

Compliance with soil cleanup levels will be evaluated through quarterly groundwater monitoring. Once groundwater cleanup levels are reached through four consecutive quarters of monitoring, soil samples will be collected (as required) to verify in situ conditions prior to releasing the site.

Sample collection and laboratory analyses will be conducted in accordance with the ***Sampling and Analysis Plan***, provided in Appendix B. Field sampling activities will be conducted in accordance with the ***Health and Safety Plan*** for the Site, provided as Appendix C.